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8 Attorney for Assignee of Bank One, Texas, N.A.
9 Judgment Creditor/Successor In Interest
10 Cadlerock Joint Venture, II, L.P.

11 UNITED STATES DISTRICT COURT

12 STATE OF NEVADA, RENO

13 HUBERT WENDALL BOEN and,
14 BARBARA J. BOEN,

15 Plaintiffs,

16 vs.

17 FIRST COLONIAL MORTGAGE, INC. and
18 R.T. CURTIS, individually and d/b/a
19 TEXAS-SUN CO.,

20 Defendants.

Case No. 3:20-cv-00664-MMD-CLB

**STIPULATION TO EXTEND TIME TO
FILE A RESPONSE/OPPOSITION TO
THE DEFENDANT/JUDGMENT
DEBTOR R.T. CURTIS'S MOTION FOR
RELIEF FROM JUDGMENT, AND
CURTIS'S SUBSEQUENT REPLY
THERE TO [FRCP 60(b)] (#3)**

[FIRST REQUEST]

21 AND ALL RELATED CROSS, THIRD,
22 AND FOURTH PARTY CLAIMS

23 IT IS HEREBY STIPULATED by and between the undersigned counsel for
24 Defendant/Judgment Debtor R.T. Curtis ("Judgment Debtor") and counsel for Plaintiff
25 Assignee/Judgment Creditor Cadlerock Joint Venture II, L.P. ("Judgment Creditor"), that pursuant
26 to L.R. IA 6-1, Judgment Creditor shall have an EXTENSION of time to serve a response/opposition
27 to the November 25, 2020 "DEFENDANT/JUDGMENT DEBTOR R.T. CURTIS'S MOTION FOR
28 RELIEF FROM JUDGMENT [FRCP 60(b)] (#3)" ("Motion (#3)") until December 14, 2020. The
current response/opposition deadline for the Motion (#3) is December 9, 2020. This stipulation is

1 made to provide Judgment Creditor additional time to gather evidence in the form of exhibits and
2 affidavits in response and opposition to the Motion (#3). Judgment Creditor has been making a
3 diligent effort to obtain such evidence in time but one anticipated affiant is beginning a scheduled
4 virtual trial in another case and preparing for a scheduled virtual deposition and certain exhibits have
5 been ordered/requested but may not arrive before the current due date of the response/opposition.
6 At this time there is no hearing date for the Motion (#3), according to the Court's calendar and
7 PACER records and counsel for Judgment Debtor consents to this brief first extension.


8 It is further stipulated that the deadline for filing Judgment Debtor's reply to the Judgment
9 Creditor's response/opposition is extended from seven days per local rule LR 7-2(b) to 14 days, i.e.,
10 the Judgment Debtor's reply shall be filed not later than December 28, 2020. This brief extension of
11 time is requested due to staff vacation and office holiday scheduling constraints affecting counsel
12 for Judgment Debtor. This is the first stipulation for extensions of time relative to the opposition
13 and reply regarding Motion (#3).

14 IT IS SO STIPULATED.

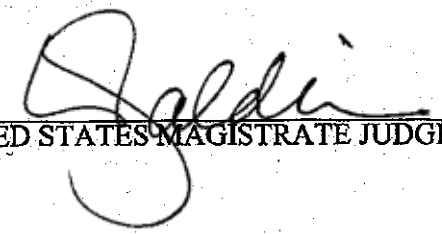
15 Dated this 8th day of December, 2020

16 
17 Assly Sayyar, Esq. (SBN 9178)
18 Attorney for Cadlerock Joint Venture, II, L.P.

18 Dated this 8th day of December, 2020

19 
20 Andrew N. Wolf, Esq. (SBN 4424)
21 Attorney for R.T Curtis

22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE
25

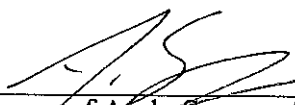
26 Respectfully Submitted By:

27 
28 Assly Sayyar, Esq. (SBN 9178)
Attorney for Cadlerock Joint Venture II, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of December, 2020, a copy of the
STIPULATION TO EXTEND TIME TO FILE A RESPONSE/OPPOSITION TO THE
DEFENDANT/JUDGMENT DEBTOR R.T. CURTIS'S MOTION FOR RELIEF FROM
JUDGMENT [FRCP 60(b)] (#3) [FIRST REQUEST] was served via ECF/Eservice on the
following parties and/or their attorneys:

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An employee of Assly Sayyar, Attorney at Law